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LM/JT USAO#2021R00437

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

JAMAL MCDONALD

Defendant.

CRIMINAL NO. RDB-22-0307

(False Statements in Connection with
Acquisition of a Firearm, 18 U.S.C. §
922(a)(6); Interstate Transportation of
Stolen Motor Vehicle, 18 U.S.C. § 2312;
Forfeiture, 18 U.S.C. § 924(d), 28
U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(False Statements in Connection with Acquisition of a Firearm)

The Grand Jury for the District of Maryland charges that:

On or about May 13, 2021, in the District of Maryland, the defendant,

JAMAL MCDONALD,

in connection with the acquisition of a firearm, to wit a Smith & Wesson SD40VE .40 caliber pistol bearing serial number FDF4894, from Tyler Firearms, LLC, a federal firearms licensed dealer, knowingly made a false and fictitious written statement to Tyler Firearms, LLC, which statement was intended to and likely to deceive Tyler Firearms, LLC, as to a fact material to the lawfulness of such acquisition of the said firearm under chapter 44 of Title 18, United States Code, in that he made the statement represented that he was the actual buyer/transferee of the firearm and was not acquiring the firearm on behalf of another person, when in fact, as he then well knew, he was not the actual buyer/transferee of the firearm and was acquiring the firearm on behalf of another person.

18 U.S.C. § 922(a)(6)

COUNT TWO

(False Statements in Connection with Acquisition of a Firearm)

The Grand Jury for the District of Maryland further charges that:

On or about July 2, 2021, in the District of Maryland, the defendant,

JAMAL MCDONALD,

in connection with the acquisition of a firearm, to wit a Smith & Wesson M&P40 Shield .40 caliber pistol bearing serial number HRF2454, from Tyler Firearms, LLC, a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Tyler Firearms, LLC, which statement was intended to and likely to deceive Tyler Firearms, LLC, as to a fact material to the lawfulness of such acquisition of the said firearm under Chapter 44 of Title 18, United States Code, in that he made the statement represented that he was the actual buyer/transferee of the firearm and was not acquiring the firearm on behalf of another person, when in fact, as he then well knew, he was not the actual buyer/transferee of the firearm and was acquiring the firearm on behalf of another person.

18 U.S.C. § 922(a)(6)

COUNT THREE
(Interstate Transportation of Stolen Motor Vehicle)

The Grand Jury for the District of Maryland further charges that:

On or about May 4-5, 2022, in the District of Maryland, the defendant,

JAMAL MCDONALD,

did unlawfully transport in interstate commerce a stolen motor vehicle, that is, a 2009 Nissan Altima, VIN ending in 200878, bearing Florida license plates 17AXKU, from the State of Florida to the State of Maryland, knowing the same to be stolen, in violation of Title 18, United States Code, Section 2312.

18 U.S.C. § 2312

FORFEITURE

The Grand Jury for the District of Maryland further finds that:

1. All allegations set forth in Counts One and Two are hereby incorporated by reference.

2. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance 28 U.S.C. § 2461(c) and other statutes cited herein in the event of the defendant's conviction(s).


Firearms and Ammunition Forfeiture

3. Pursuant to 18 U.S.C. § 924(d), upon conviction of any Count(s), the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the offense(s).

Property Subject to Forfeiture

4. The property to be forfeited includes, but is not limited to, the following:
- a. Smith & Wesson SD40VE .40 caliber pistol bearing serial number FDF4894; and
 - b. Smith & Wesson M&P40 Shield .40 caliber pistol bearing serial number HRF2454.

18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)


Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson ✓

8/30/2022
Date